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May 12, 2025

CONSENT LETTER MOTION

MEMO ENDORSED

Honorable Jessica G.L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1040
New York, NY 10007

Re: *Parker v. Bursor*, 24-cv-245 (JGLC)(RFT); Consent Letter Motion for Leave to Serve First Amended Complaint and Answer and Counterclaim on Counterclaim Defendants and Granting Counterclaim Defendants Access to Sealed Filings

Dear Judge Clarke:

This Firm, along with Judd Burstein, P.C., represents Defendants Scott Bursor and Bursor & Fisher, P.A. (collectively, "Defendants") in the above-referenced matter. This consent letter-motion is submitted pursuant to Rule 5 of Your Honor's Individual Practices in Civil Cases, seeking an order permitting Defendants to serve the First Amended Complaint and Answer and Counterclaim on the Counterclaim Defendants and granting the Counterclaim Defendants access to pleadings currently under seal in this matter.

As your Honor may be aware, Defendants filed their Answer and Counterclaim on Thursday May 8. We are in the process of obtaining summonses. Because the Counterclaim makes reference to confidential information produced under the protective order in the case, and because the Answer and Counterclaim is currently filed under seal, we are writing to request permission to serve the First Amended Complaint and the Answer and Counterclaim on the Counterclaim Defendants at this time. Plaintiff has consented to the service of these pleadings on the new parties.

We expect that counsel for the Counterclaim Defendants will want to gain access to the other sealed documents on the docket once they appear in this case. We therefore also request the Court's permission to allow the Counterclaim Defendants to have access to all sealed documents on the docket once counsel has appeared in the action and can be bound by the Court's sealing order and protective order. Counsel for Plaintiff has consented to this request as well.

Accordingly, we respectfully seek an order (1) granting Defendants leave to serve the First Amended Complaint and Answer and Counterclaim on the Counterclaim Defendants; and (2) allowing access to the other sealed documents on the docket once the party formally appears in the case and formally agrees to be bound by the protective order and the sealing order.

GIBBONS P.C.

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We thank the Court for its consideration of this request.

Respectfully submitted,


Christine A. Amalfe

cc: All counsel of record (via e-mail)

Application GRANTED. Defendants may serve the First Amended Complaint and Answer and Counterclaim on the Counterclaim Defendants. When Counterclaim Defendants appear in the case and agree to be bound by the protective order and sealing order, they will be allowed access to the sealed documents on the docket.

The Clerk of Court is directed to terminate ECF No. 400.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: May 13, 2025
New York, New York